

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11 Case No.
	:	08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	(Jointly Administered)
Debtors.	:	
	:	

**NOTICE OF INTENT TO PARTICIPATE IN
DISCOVERY RELATED TO PLAN CONFIRMATION**

NOTICE IS HEREBY GIVEN that **JPMorgan Chase Bank, N.A., J.P. Morgan Bank Dublin PLC, JPMorgan Chase Funding Inc., J.P. Morgan Clearing Corp., J.P. Morgan International Bank Limited, J.P. Morgan Markets Limited, J.P. Morgan Securities Inc., JPMorgan Securities Japan Co., Ltd., J.P. Morgan Securities Ltd., J.P. Morgan (Suisse) SA and J.P. Morgan Ventures Energy Corporation** (collectively, the “JPMorgan Parties”), represented by Wachtell, Lipton, Rosen & Katz, filed Claims Numbers¹ 66466, 66476, 66473, 66465, 66469, 66462, 66468, 66455, 66467, 66471, 66463, 66475, 66474, 66451, 66452, 66456, 66470, 66453, 66464, 66472 and 66454, on April 1, 2010², against Lehman Brothers Holdings Inc., Lehman Commercial Paper Inc., Lehman Brothers Commercial Corporation, Lehman Brothers Commodity Services Inc., Lehman Brothers Derivatives Products Inc., Lehman Brothers Financial Products Inc., Lehman Brothers OTC Derivatives Inc. and Lehman Brothers Special Financing Inc. and are parties in interest in the confirmation of a plan in the above-captioned chapter 11 cases (the “Chapter 11 Cases”).

ACCORDINGLY, PLEASE TAKE FURTHER NOTICE that, subject to any objections by the Debtors or the Statutory Committee of Unsecured Creditors appointed in the Chapter 11 Cases and/or any limitations imposed by the Court, the JPMorgan Parties and their

¹ These Claims amended and superseded, respectively, Claims Number 27207, 27193, 27184, 27206, 27203, 27198, 27202, 27189, 27194, 27205, 27199, 27190, 27204, 27192, 27191, 27181, 27183, 27186, 27197, 27201 and 27187 that had been previously filed on September, 22, 2009.

² Certain of the listed Claims were partially transferred to Lehman Brothers Holdings Inc. pursuant to the Collateral Disposition Agreement (“CDA”), dated as of March 16, 2010, that was approved by the Court by an order dated March 24, 2010. The relevant JPMorgan Parties have a continuing interest in such partially transferred claims pursuant to the provisions of the CDA.

counsel intend to participate in Plan Discovery, as defined in the Order Establishing Procedures in Connection with Discovery Related to Plan Confirmation and Other Issues, entered by the Court on April 14, 2011.

Dated: April 26, 2011

WACHTELL, LIPTON, ROSEN & KATZ

By: /s/ Harold S. Novikoff
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Designation of Contacts to Receive any Notices Required under the Order

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Group that Participant Elects to Join Pursuant to Paragraph 3(b) of the Order

(v) Creditors of the Derivative Entity Debtors³

³ The JPMorgan Parties hold claims represented by other groups, and reserve their right to assert such claims fully and make requests relating to any chapter 11 issues.